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June 25, 1999

Jane Henney, M.D., Commissioner
Food and Drug Administration (HF-I)
5600 Fishers Lane
Rockville, MD 20857

Dear Commissioner,

I am writing today to ask you to withdraw approvals for the use of medically important antibiotics to promote growth in livestock. Antibiotics should only be used to treat sick animals, not promote growth. The World Health Organization recommends a ban on the use of medically important antibiotics to promote animal growth and I think the United States should follow this recommendation. I know the Center for Science in the Public Interest has petitioned the FDA to take this action and I support CSPI in this petition.

I am extremely concerned about the growing problem of antibiotic-resistant bacteria that is caused in part by our overuse and misuse of antibiotics in our society. These antibiotics are crucial for fighting disease in humans and we need to save them for that purpose.

In addition to the problem of creating antibiotic-resistant bacteria, we do not know the long term health effects of eating meat that contains antibiotic residues. This is one of the reasons I have quit eating meat entirely, have greatly reduced my consumption of all other animal products and eat certified organic foods as much as possible. I recommend to my friends to at least eat certified organic animal products if they are not willing to give them up completely.

I am including two articles I have read on the issue for your information. I hope that you will take the above action I request. We need to produce food in a sustainable fashion and the use of antibiotics for growth is neither safe nor sustainable. The FDA needs to help ensure a safe, sustainable food supply for the American people and the people of the world. Thank you in advance for your time and consideration.

Sincerely,

James F. Montgomery

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February 26, 1999

Bacteria Resistant to Powerful Antibiotics Are Discovered in Chicken Feed

By DENISE GRADY

Bacteria that are resistant to the most powerful antibiotics used to treat infections in people have been found in **chicken** feed, researchers are reporting, a finding that is likely to fuel concerns about the threat to public health from widespread use of antibiotics.

The researchers studied only a small amount of feed. Still, they said, finding such organisms on the threshold of the human food supply was an ominous sign. They said their discovery might be the first report of such contamination in the United States. The scientists, from the University of Maryland, are reporting their findings on Friday in the British medical journal The Lancet.

Although animal feed is not expected to be germ free and the bacteria were not harmful to healthy people, the organisms' ability to withstand potent antibiotics may pose a threat to public health, the scientists said. If people who eat or handle contaminated **chicken** become infected, the harmless bacteria may pass their genes for drug-resistance to other, dangerous organisms. Or, in patients with lowered immunity from AIDS or treatments for cancer or organ transplants, the once-harmless microbes may turn dangerous.

Illnesses caused by drug-resistant bacteria can be fatal, or require treatment with several drugs. Such infections are increasing in the United States and Europe.

Many scientists attribute the growing strength of microbes to the overuse of antibiotics, in people and in agriculture. Nearly half the 50 million pounds of antibiotics produced in the United States are used in animals, mostly as feed additives to promote growth.

In any population of bacteria, some may naturally be more resistant to antibiotics, and when infections are treated with the drugs, the resistant microbes may survive and multiply. Each time antibiotics are given, they may be less effective because more bacteria are resistant.

"Studies show that rather than a single bad strain in a hospital, there are hundreds, if not thousands," said Dr. J. Glenn Morris Jr., head of hospital epidemiology at the University of Maryland in Baltimore, and an author of the

Lancet study, which was published as "a research letter," a report less comprehensive than an article. "The more we look, the more we find these multiresistant organisms everywhere. Where are they coming from?"

Dr. Morris said he and his colleagues, who had seen patients die from drug-resistant infections, thought the organisms might be coming from different sources, and wondered if one might be food. They knew that in Europe, use of a powerful **antibiotic** in animal feed had been linked to resistant infections in both livestock and in people who ate meat from infected animals.

To find out whether some infections could come from what the animals ate, the researchers tested commercial **chicken** feed they had bought in a closed sack and opened under sterile conditions.

They did not expect to find anything, Dr. Morris said, so they were shocked to find bacteria known as enterococci, normal inhabitants of the intestine in people and animals, that were resistant to multiple antibiotics.

Most disturbing, Dr. Morris said, the organisms were resistant to vancomycin, a powerful drug that was long considered the last line of defense against dangerous infections. But deadly infections resistant to the drug began showing up in people in the United States in the past few years. The organisms have never been detected in chickens in the United States, Dr. Morris said.

"If it's in feed," he added, "it may subsequently show up in chickens and serve as another mode of introduction into human populations."

Dr. Morris would not name the manufacturer of the feed and said he had no explanation for how it might have become contaminated, or how the enterococci became resistant to antibiotics.

He said the feed did not contain **antibiotic** additives.

The nation's largest **chicken** producers use no bagged feed, said a spokesman for one, Tyson Foods, who said they make their feed.

Dr. Stephen F. Sundlof, director of the Center for Veterinary Medicine at the Food and Drug Administration, said he was puzzled by the report, because feed pellets were normally produced under such high temperatures and pressure that bacteria would die.

But, Dr. Sundlof said, "if the feed is contaminated, and from consuming that feed, our livestock become reservoirs for vancomycin resistant enterococci, then potentially we could have a problem."

Monday, March 15, 1999

It's a Matter of Health

Several strains of bacteria have in the last decade developed resistance to the most powerful antibiotics we can throw at them. One root of the problem is the livestock industry's practice of dumping millions of pounds of antibiotics into animal feed and water every year. The antibiotics act as growth promoters--cheap ways of fattening livestock--but they also create "superbugs." These mutant strains of bacteria have developed immunities to antibiotics and can infect humans who handle raw meat and poultry, or eat undercooked food. The virtually untreatable illnesses that may result range from unpleasant to deadly.

The European Union last year banned the use of antibiotic growth promoters in livestock if those same antibiotics are used to treat disease in humans. Last week, a coalition of 41 health and consumer groups called on the Food and Drug Administration to pass a similar ban in the United States.

Chances of that happening are slim, for reasons of politics, not science. Lobbyists for politically powerful drug companies, which rake in billions of dollars every year selling antibiotics to U.S. farmers, are pressuring Congress to prohibit the FDA from even implementing its newly proposed "framework." That modest plan calls on the meat industry to study problem antibiotics and limit the use of especially harmful ones.

Lobbyists representing the livestock industry argue that any limit on the use of antibiotic growth promoters would have an "adverse to severe" impact on their industry. In fact, the industry knows that little economic harm followed when Britain banned the use of antibiotic growth promoters in 1969, or when Denmark did the same in 1996. Last year, a National Academy of Sciences study used the industry's own estimates to calculate that if the entire livestock industry eliminated the use of antibiotic growth promoters--though not antibiotics used to fight animal illnesses--the added costs would be no more than $10 per American consumer per year.

Congress has buckled to the industry's arguments in the past. When FDA scientists first proposed curtailing antibiotic growth promoters in 1980, the House Agriculture Committee promptly passed a measure stating, "FDA will be expected to continue to hold in abeyance any implementation of its proposal." And when the agency tried again to protect the public safety in 1985, the Senate Agriculture Committee stood in its way, cryptically referring to unspecified "information" it had which "calls into question" the results of a National Academy of Science study showing that antibiotic use in livestock, along with antibiotic overuse in human illness, creates superbugs.

Since then, the problem of treatment-resistant bacterial illness has grown considerably. Last year, the New England Journal of Medicine reported that salmonella bacteria in food were resistant to five of medicine's strongest antibiotics. And this spring, the New England Journal of Medicine will publish a study by Minnesota health researchers which finds that the incidence of bacteria resistant to the newest and strongest available antibiotic, called fluoroquinolones, increased from 1.3% to 10.2% since 1992.

Key legislators, including Sen. Dianne Feinstein (D-Calif.), who serves on the Senate Agriculture Subcommittee debating the issue, must show some spine this time around. Congress should resist the lobbyists' pressure and heed scientists' call to protect the public interest.

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PM
28 JUN
1999

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